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ABSTRACT

Past federal educational policy failures can be traced to three sources. The first is unrealistic expectations about schools' capacity for social reform, about the time needed to produce significant change, and about the degree of federal leverage over local school district behavior. The second source is the misconception that improving educational performance requires innovative educational technologies, missing "inputs," and a project focus for federal funds. Third, federal programs have suffered from poor implementation. Premises about the operation of state education agencies (SEAs) and local school districts gleaned from research literature suggest several recommendations to help make federal educational policy more effective in promoting local change. (1) The federal government should establish an Area Cooperative Program that would provide assistance to school districts for the implementation of federal programs. (2) The federal government should establish a district-based professional growth program for the purpose of developing school districts' capacity to provide staff development on a regular basis. (3) The federal government should revise the Elementary and Secondary Education Act Title IV to strengthen the administrative capacity of SEAs to more effectively influence district performance. (4) Federal agencies should develop accounting and programmatic control procedures that permit the integration of federal and state (or local) categorical funds. (Author/JM)

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RETHINKING THE FEDERAL ROLE IN EDUCATION

Paul Berman and Milbrey McLaughlin

May 1978

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PREFACE

This Paper was requested by the Office of the Assistant Secretary of Education (ASE) as part of the work of The Rand Corporation's Center for Educational Finance and Governance. In light of Congress' deliberations on the reauthorization of the Elementary and Secondary Education Act, ASE wanted to provide policymakers with information about recent research findings concerning the effectiveness of federal programs. Based on Rand's Change Agent study as well as other relevant research, this essay analyzes past federal policy and suggests steps for improvements.

Our Rand colleague John Pincus and Mary Moore of ASE made helpful comments on an earlier draft of this manuscript. Responsibility for the data and interpretations offered in this essay, of course, remains with the authors.

SUMMARY

This essay has two purposes--(a) to provide federal policy makers with information about recent research findings relevant to federal support for improved educational practice, and (b) to recommend changes in existing federal educational policy in time for the 95th Congress' deliberations on the reauthorization of the Elementary and Secondary Education Act. The essay first examines the sources of ineffectiveness in the past decade's educational policy. It then suggests premises about the structure and behavior of school districts (LEAs) and state educational agencies (SEA) that could be used as operational principles in the construction of federal policy. Based on these premises, this paper closes with broad recommendations for new federal programs and for modifications to existing federal policy.

SOURCES OF INEFFECTIVENESS IN PAST POLICY

Past federal policy failures can be traced to three sources: unrealistic expectations, incorrect assumptions about local school district behavior, and poor implementation. First of all, federal policy had unrealistic expectations about the extent to which schooling can be an effective agent of social reform, about the time needed to produce significant change, and about the degree of federal leverage over local school district behavior. These problems are serious, but they do not imply that the federal government should relinquish its newly legitimized role in public education. The real lesson is that the federal government must identify ways to adjust policy within the constraints of the educational system.

Second, federal policy often seemed to embody misconceptions about the reality of school districts and the factors that produce change in their organizational and educational practice. Three such assumptions were:

1. Improving educational performance requires *innovative educational technologies.*

2. Improving educational performance requires the provision of *missing "inputs"* to school districts.
3. Improving educational performance requires a *project focus* for federal funds.

Research findings show that the policy guidelines and procedures based on these technocratic, missing inputs, or project assumptions are not sufficient to produce consistent educational improvement.

Third. federal programs have suffered in implementation, particularly in administration and in relations between levels of government. The administrative problems reflect the incremental, disjointed, and almost apologetic fashion in which federal education policy has been made in the past decade. Federal goals and objectives typically have been articulated in a series of disparate (and sometimes ephemeral) categorical programs. USOE, which implements these programs, comprises uncoordinated fiefdoms that sometimes work at cross purposes. Moreover, relations between federal, state, and local agencies have suffered because federal management strategies have overemphasized uniformity in the administration of policies.

Although these sources of federal policy ineffectiveness are serious, they can be ameliorated without significant increases in federal aid and without the development and dissemination of more new educational technologies. "Solutions" to these problems require a variety of short- and long-run measures. In the short term, federal agencies need to improve their own management performance and to assist SEAs and LEAs in improving theirs; in the long term, the relationships among federal, state, and local education agencies ought to evolve toward a more cooperative form of federalism.

REORIENTING FEDERAL EDUCATIONAL POLICY

The research literature suggests a number of premises about the structure and behavior of LEAs and SEAs that can be used to identify both leverage points and constraints for federal policy. These premises could serve as operational principles in reorienting federal education policy. These premises are:

1. Localism. The outcomes of change efforts are primarily determined by local decisions and conditions. Those local factors can be influenced only indirectly by federal policy inputs such as money and new educational methods. In addition to the abilities and motivations of students, the primary factors affecting outcomes are:

- o the abilities and motivations of teachers
- o participation of teachers in project decisions
- o district staff assistance and development strategies
- o leadership of school principals and project directors
- o district support for the change effort
- o district management capacity.

Federal policy has to address these factors in order to improve educational performance.

2. Stages in Local Change Process. Federal policy has typically focused on providing incentives for the *adoption* of change efforts. But the local change process consists of two additional stages that are pivotal to both short- and long-run educational outcomes. The three stages are *mobilization* (which includes adoption), *implementation*, and *institutionalization*. Mobilization is essential because the change effort is likely to be perfunctory unless the school district undertakes problem-solving planning and generates broad-based support at the outset. Implementation matters because educational outcomes ultimately depend on how teachers carry out change efforts in their classrooms. Institutionalization--when a change effort becomes a standard part of district operations--is pivotal because change efforts, even successful ones, tend to disappear. Federal policy could increase its influence on educational outcomes if it could positively affect *all* these stages, not just the first.

3. School Districts Vary in Institutional Motivation and Capacity. Variability across school districts has long been appreciated, but its most significant aspects have not been recognized. Federal policy takes variability into account somewhat by adjusting otherwise uniform formulas for such parameters as size, high cost students, etc. Beyond such

quantitative characteristics, however, the main institutional features affecting district educational performance are the district's management capacity and motivations. To influence these features, which vary considerably for districts having similar demographic and socioeconomic backgrounds, federal policy may have to pursue differentiated strategies, either directly or operating through SEAs.

4. School Districts Need Adaptive Implementation Assistance. School districts need assistance to implement change efforts effectively; however, such assistance should avoid the mistakes of the past decade's technical assistance with its reliance on technology and special projects. Instead, assistance should be broader gauged. The following characteristics define adaptive assistance:

- o *Systemic focus*--the "target" of implementation assistance efforts should be the local school district (not just the individual teacher, school, or project); it should address general issues of management of change, not simply on discrete problems such as reading scores.
- o *Continuing*--implementation assistance should be offered on a steady basis, not just at the outset of a planned change effort.
- o *Practitioner-based*--implementation assistance should be provided by local or regional resource personnel.
- o *Process-oriented*--implementation assistance should support local efforts to identify and carry out solutions, rather than importing external solutions; it should not co-opt opportunities for local personnel to "learn-by-doing."

5. SEAs Are Best Suited to Influence and to Provide Opportune Assistance to LEAs. Despite significant weaknesses among SEAs, they, rather than federal agencies, have the potential to supply support and assistance of the type implied by the preceding premises about school districts. Federal policy should continue to expand its operational use of SEAs.

6. SEAs Vary in Their Administrative Capacity. State departments of education differ in their administrative capacity as well as in their

motivation to implement federal policy or to influence school district behavior. However, federal policy generally treates the states uniformly. This seems both ineffective and inefficient. Federal policy should develop differentiated strategies toward SEAs.

7. Many SEAs Require Further Administrative Development. Although the SEAs' administrative development has progressed rapidly since the passage of ESEA, many state departments remain ineffectual in influencing LEAs. Unless this situation is changed, federal reliance on state implementation of federal policies will be futile. Federal policy should aim to improve SEAs' administrative capacity.

These premises direct attention to areas that federal policy has often neglected or, at least, treated as secondary. For example, they suggest that local adoption of projects should not be the sole federal policy focus; that federal considerations about improving the change process within school districts should take precedence over their past concern with improving educational products; that federal evaluators should expect and encourage the adaptation of change efforts; that the federal government should promote local institutional development in addition to more targeted project approaches; and that federal legislation should establish ways to provide more differentiated and flexible support to state departments of education and to school districts. In short, these premises suggest a shift in the federal role toward educational change, one which might well imply a strengthened role for state educational agencies.

These principles point in the direction of a flexible federal role that aims to facilitate local change efforts, rather than control them. The long-term goal would be to encourage an increasing number of school districts to develop the institutional capacity for improving their own performance. Ideally, federal assistance would diminish over time, and federal leadership would be exercised by setting national priorities and by strengthening the natural linkages among school districts and among SEAs.

The states also would have to be more flexible and responsive to local needs and conditions than before. Indeed, if the states could

nurture local district development, they would provide the key to long-term prospects for educational improvement. Despite the progress states have made in the past decade, few SEAs presently are capable of handling a more demanding role. It would appear that federal educational policy should aim to strengthen the administrative capacity of SEAs (without making them agents of the federal government within unreceptive state governments). The exercise of federal leadership would lie in fostering interdependent--rather than either autonomous or hierarchial--relationships among federal, state, and local levels so that the inevitable bargaining and conflict among these actors could be conducted within a cooperative framework.

RECOMMENDATIONS

Cooperative federalism cannot be mandated. On the contrary, this goal can only be achieved by an evolutionary process comprised of specific, mostly incremental changes to the existing educational system. The earlier analysis of federal policy ineffectiveness as well as the above premises suggest the following priority areas for concerted federal change efforts:

- o local staff's ability to implement change
- o LEAs' management capacity
- o SEAs' administrative capacity
- o links among LEAs, SEAs, and federal agencies
- o OE's administrative capacity

Attention to these priority areas would hold the promise of improving the performance of the educational system in the short term while moving toward the longer run ideal of cooperative federalism.

The following broad recommendations are aimed at strengthening federal policy in each of the above areas. They all consist of incremental changes that could be implemented without massive infusions of additional federal funds. The recommendations contain guidelines for policy designers, but do not deal with specifics that can only be developed by legislating, administering, and implementing policy:

Recommendation 1. *The federal government should establish an Area Cooperatives Program that would provide assistance to school districts for the implementation of a broad spectrum of federal programs (e.g., Title I or Title VII of ESEA), state reform efforts (e.g., change in financing, in early childhood education, or in special education), and local change efforts (e.g., desegregation or adjustments to enrollment decline). The Area Cooperatives would be staffed by practitioners on "leave" from school districts within a regional cluster. The program would be funded by the federal government and administered by the States who would help establish the Area Cooperatives and insure that they follow a set of principles embodied in federal legislation. These principles are:*

a. Area Cooperatives should be administered as a separate and distinct program with prescribed funding levels.
b. Although Area Cooperatives would necessarily be affiliated with state governments, they should have no regulatory function--i.e., they should not engage in such state activities as data collection for evaluation nor provide inputs for specific programmatic decisions.
c. Area Cooperatives should offer comprehensive service.
d. Area Cooperatives should have a broad-based governance structure.
e. Area Cooperatives should provide for the needs of administrators as well as teachers.

Recommendation 2. *The federal government should establish a District-based Professional Growth program for the purpose of developing school districts' capacity to provide staff development on a regular basis. The program would be funded by the federal government and administered by the States, who would develop funding, award, and evaluation procedures based on federal guidelines. These guidelines should incorporate the following principles:*

a. States' awards to school districts should be used to

develop the district's capacity to provide staff development.

b. Administrators should be explicitly included in the staff development programs.
c. Staff development efforts should have a school site component.
d. Staff development programs for a local school district should have joint governance; teachers and administrators should have equal voice in determining the nature, format and frequency of staff development activities.
e. Staff development programs should provide some release time for participants.
f. Staff development programs should contain multiple and differentiated options.

Recommendation 3. *The federal government should revise ESEA Title IV to strengthen the administrative capacity of SEAs so that they can more effectively influence LEA educational performance. The following principles should be used:*

a. The federal government should require matching funds for at least part of the Title IV funds allocated for strengthening the administrative capacity of SEAs. Federal technical assistance efforts could promote more effective use of these "strengthening" funds.
b. The Title IV State Advisory Group membership should be revised to include expertise in the management of change.
c. State Plan requirements should be revised to emphasize a flexible, iterative planning process.
d. State Plans should be extended to a period of three years.
e. States should key their awards of Title IVC funds to the nature of the local innovative process by awarding three types of grants--a planning grant of one year duration, an implementation grant of two to three years duration, and an incorporation grant of two years duration.

Recommendation 4. *Federal agencies should develop accounting and programmatic control procedures that permit the integration of federal and state (or local) categorical funds.*

The essay discusses the basis for each recommendation and presents details of the principles that could be used to design the pertinent federal legislation and guidelines.

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I. INTRODUCTION

Historians eventually may view the decade of educational reform, which began with the passage of the Elementary and Secondary Education Act of 1965 (ESEA), in a different light from present-day social planners. Ratification of the Elementary and Secondary Education Act of 1965 signalled a new federal interest in educational change. This new federal role was born both from concern that particular student groups, such as the disadvantaged, receive special attention as well as a belief that additional resources could promote more effective educational services for all the nation's schoolchildren.

Seen from the perspective of national policy makers, federal efforts to stimulate educational change have been disappointing. Although evaluators of federal programs may disagree about questions of evidence and measurement, no analyst seriously contends that these programs have produced the massive improvement in student achievement or other student outcomes that were forecast during more optimistic times. The track record casts doubt about the effectiveness of federal intervention in reforming elementary and secondary education and about the wisdom of any continuing federal role.

The picture looks less bleak, however, when placed on a broader canvas. The debates of the '50s and '60s over the propriety of federal aid to education have now faded into the background. The federal role has been legitimized and federal aid is a now relatively stable 7 to 8 percent of national spending on elementary and secondary education. Moreover, some favorable consequences are noticeable. Such federal programs as Title I and Title VII have distributed supplemental resources to needy students and school districts. And, perhaps more significantly, the federal emphasis on equal educational opportunity, career education, innovations, and so on has influenced the priorities of local and state education agencies as well as teacher colleges and book publishers. The federal government has, in short, partly filled the vacuum of leadership in today's education system.

The balance between these negative and positive aspects of federal

efforts is hard to judge. A skeptic could argue that, notwithstanding some helpful marginal effects, the general ineffectiveness of federal programs argues for a sharply reduced federal role. Our understanding of the reasons for the ineffectiveness of federal programs leads us to a more hopeful view.

Past programmatic failures can be traced to three general sources: unrealistic expectations, incorrect assumptions about local school district behavior, and poor implementation. We believe these problems, which the next section discusses in detail, can be ameliorated without significant increases in federal aid and without the development and dissemination of more educational technologies. In our view, the solutions require a variety of short- and long-run measures. In the short term, federal agencies need to improve their own management performance and to assist SEAs and LEAs in improving theirs; in the long term, the current relationships among federal, state, and local levels in the education system ought to evolve toward a more cooperative form of federalism.

A fundamental reworking of the federal role in education is possible at this time because most major pieces of education legislation face reauthorization in 1978. The 95th Congress thus has an opportunity to play a role in education policymaking similar in significance to that of the 89th Congress in passing the Elementary and Secondary Education Act of 1965. But whereas the initiatives of the 89th Congress were based more on the hopes and expectations of reformers than knowledge of the education system, the deliberations of the 95th Congress can be informed by the lessons of the past decade.

In light of these deliberations, the Office of the Assistant Secretary of Education (ASE) requested this essay. Its purpose is to provide policy makers with information about the findings and implications of Rand's research on federally supported Change Agent projects and on the behavior of local and state educational agencies.*

*The findings of this research, sponsored by the Office of Education, are reported in eight volumes under the general title, *Federal Programs Supporting Educational Change*, The Rand Corporation, R-1589-HEW. A second Rand research study, sponsored by the National Institute of

In the course of preparing this paper, we interviewed many local, state, and federal education officials. We solicited their opinions about the implications of our research and the appropriate direction for federal policy in order that our recommendations would be grounded in the political as well as the substantive reality of education policy-making. Officials felt this essay would be most useful to them if it focused on three areas--what went wrong with past federal policy, what operational principles should be followed in designing policy, and what specific programmatic changes or additions should federal policy-makers consider.

Accordingly, this essay begins by identifying the main sources of ineffectiveness in the past decade's educational policy. The critical problem was poor implementation of federal initiatives at all levels of the educational system. Consequently, we will diagnose weaknesses in policy implementation, rather than treating the policy's programmatic content. Moreover, our analysis of what went wrong will imply that the road to educational improvement does not lie in minor adjustments to current policy procedures or in more of the same policy of supplemental funding, new technologies, and technical assistance. Instead, better policy execution is needed, and this requires a basic reorientation of the federal role in education--a new point of view. The final chapter suggests some building blocks for constructing a revised federal role by outlining operational principles about LEA and SEA behavior toward planned change efforts. In addition, we close with programmatic recommendations that are derived from or are consistent with the operational principles. These recommendations provide concrete illustrations of how federal policy could be changed in the short run to contribute to the future development of a more effective federal role.

Education, focused on the operations of five school districts; this study, which is not yet published, will be referred to as Berman and McLaughlin, *Adaptation With and Without Change* (draft), 1976.

II. SOURCES OF INEFFECTIVENESS IN PAST POLICY

If federal educational policy during the past decade consisted of one unequivocal law administered by a single agency that had relatively constant leadership which issued consistent and coherent guidelines, it would be easier to pinpoint what went wrong. Instead federal "policy" encompassed many programs that reflected many "policies" and many actors. Some programs seemed sensible, even in retrospect, and numerous officials worked hard to carry out their ideas. Nonetheless, the overall period was marked by confusion, instability, and considerable uncertainty about the effectiveness of federal programs and the role of USOE. At the risk of slighting the ideas and efforts of conscientious officials, we will focus on the difficulties, not the successes. Moreover, for the sake of simplification, this section will draw negative lessons somewhat more sharply than they merit and speak of federal policy as a whole rather than as the disjointed and complex reality it was.

The "ineffectiveness" of federal policy stemmed from three sources: unrealistic expectations, faulty assumptions about school district behavior, and poor implementation. Although these problems occurred together, each will be discussed in turn.

UNREALISTIC EXPECTATIONS

One reason for policy "ineffectiveness" was the setting of unreasonable goals, a failing that is obvious in the record of overblown rhetoric and exaggerated expectations of the 60's. Rather than repeat this well-known history, this section analyses the major respects in which federal policy (not just the *rhetoric* of the policy's supporters) dealt in unrealistic expectations.

First of all, federal reform policy overestimated the extent to which schooling could serve as an effective agent for social reform. For example, both proponents and critics of ESEA Title I assumed--particularly in the early years--that compensatory education strategies could contribute significantly to "equalizing" the life opportunities

of advantaged and disadvantaged youngsters. Yet, short of drastic change in the U.S. education system, there appear to be limits on how much public schooling can change students, either absolutely or relative to other social influences (e.g., the family, peers, or the economic system). In light of these limits, it becomes essential for federal education policy to aim for less and to promise less. Idealistic goals such as "eliminating illiteracy by 1984" (Right-to-Read program) are not only patently unrealistic, they also give insufficient direction to those responsible for implementation and set the stage for yet another "failure." This lesson of not overpromising seems to have been learned. Indeed, it may have been learned too well. The current trend seems to be toward retrenchment and caution in educational policy, which may be an understandable reaction to past excesses. Yet, it is perhaps better to seek goals that are somewhat beyond reach, provided that shortfalls are not interpreted as total failures, than to neglect significant problems in the educational system. Two steps--the initial setting of more realistic goals, and the upward or downward adjustment of federal objectives and expectations in response to evidence about success or failure--might help smooth out the swings between goals that are excessive and those that are too modest.

Second, federal policy makers tended to underestimate how much time is required to produce change in the educational system. Our research suggests that any significant innovation or new project at the local level takes about two years to "get off the ground," another two years to be fully implemented, and an additional one or two years to produce a stable effect on student outcomes. To this five or six years in the school district, one must add the time required for new government programs to take shape and reach stability at the state and federal level--from two years (e.g., Career Education) to five years and beyond (e.g., ESEA, Title VII). It takes, in sum, on the order of seven years before the educational effects of a new policy can be tested. For example, it has taken almost ten years for issues of compliance and program administration to be resolved for ESEA Title I.

But federal policymaking often did not show that much patience. Whatever other problems such federal programs as Model Cities or Education Professions Development Act may have had, they did not last long enough to prove themselves.

Third, federal policymakers overestimated the influence that federal incentives have over state education agency and local school district practices. It was assumed that the range of incentives and disincentives associated with federal funds afforded considerable direct leverage over state and local activities. In fact, it provided limited leverage. It was not unusual in the early years, for example, for school districts to use Title I funds for their own general purposes; similarly, the pro forma function of many Title I mandated Parent Advisory Councils is well known. Attempts to monitor or hold school districts accountable for Title I projects were effective only in one sense--namely, federal funds now do seem to be allocated to target children.* However, there is little consistent evidence that the expenditure of more money on Title I eligible youngsters has necessarily led to more effective services for this target group. On the contrary, the research evidence strongly indicates that change in school district practice depends on local choices and factors that can only be marginally affected by federal incentives. In short, federal expectations need to be adjusted to the reality of limited federal influence.

In summary, federal policy reflected unrealistic expectations about the extent to which schooling can be an effective agent of school reform, about the time needed to produce significant change, and about the degree to which federal incentives provide leverage over local school district behavior. These problems are serious, but they do not imply that the federal government should relinquish its newly legitimized role in public education. The real lesson is that the federal government msut learn to adjust policy within the constraints of the educational system.

FAULTY ASSUMPTIONS ABOUT SCHOOL DISTRICT BEHAVIOR

The unrealistic expectations about the federal leverage over

Ibid.

local behavior were symptoms of a second and more fundamental problem: federal policy often seemed to be based on misconceptions about the reality of school districts and the factors that produce change in their organizational and educational practices. Correct assumptions would not, of course, automatically improve policy effectiveness because, as the next section details, the policy may be poorly implemented. But faulty assumptions--indeed even *one* faulty assumption among otherwise good ones--can lead to ineffective and often counterproductive programs. This section analyzes various assumptions that research has shown to be faulty even though they were evident in a score of different federal programs.* We will first state the essence of each set of assumptions, trying hard to be fair to them; then, we will detail why these assumptions failed to be accurate.

> Assumption 1: *Educational Improvement Requires Innovative Educational Technologies. The adoption by the nation's school systems of new technologies (curricula, teaching practices, school management, etc.) would lead to improved student performance. One stream in this technological approach holds, for example, that variability and general inefficiency in teaching performance could be corrected by the development of "packages" of curricula and classroom management practices that would be "teacher-proof." It is assumed that technological innovation could be produced effectively in educational Research and Development Laboratories or by documenting "exemplary" projects in school districts. Once produced, the main problem would be dissemination, i.e., having schools adopt the new technologies.*

The Change Agent Study put these technological assumptions to a direct test. We tried to determine whether there was a significant

*We recognize that most federal programs contained a mix of realistic and unrealistic assumptions; therefore, our discussion should be viewed as an attempt to characterize the prevailing thrust of the past decade's federal effort rather than as an analysis of any particular program.

relationship between the type of educational method used on about 300 innovative projects funded by four federal programs and several measures of project outcome (including student performance in the study's second phase).* We found none. In other words, the adoption of any particular type of educational method did not consistently (from district to district) lead to better outcomes, even though these methods had been previously tested and developed elsewhere.

These findings may be challenged on methodological grounds, but their consistency with our case study analysis of the local process of change gives them considerable credence. We examined the three to five year history of federally funded projects and found that the *same* innovation typically was implemented *differently* in different school districts, in different schools within the same school district, and even in different classrooms within the same school. Moreover, those projects that were "packaged"--that prescribed procedures for teachers and project directors in ways that precluded the innovation's adaption to the conditions of the local setting--typically could not be implemented effectively. This evidence, as well as other research findings,** strongly suggests that the role of technology in educational reform has been misunderstood. The adoption of "better" technological innovations may be an important ingredient in a successful planned change. But, by itself, the adoption of a "better" technology does not invariably or automatically result in better student performance: how the innovation is implemented matters as much as, and often much more than, what it is.

Assumption 2: *Educational Improvement Requires the Provision of Missing "Inputs" to School Districts. It is assumed that school*

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*P. Berman, E. Pauly, *Federal Programs Supporting Educational Change, Vol. II: Factors Affecting Change Agent Projects*, R-1589/2-HEW, The Rand Corporation, April 1975; P. Berman, M. W. McLaughlin, *Federal Programs Supporting Educational Change, Vol. VII: Factors Affecting Implementation and Continuation*, R-1589/7-HEW, The Rand Corporation, April 1977.

**See M. Fullan and A. Pomfret, "Research on Curriculum and Instruction Implementation," *Review of Educational Research*, Vol. 47, No. 2, Spring 1977, pp. 335-397.

districts would reform themselves if they had more money, greater awareness of innovations, or increased technical know-how. The need is to supply the missing "input"--supplemental federal funding, information about innovations, or technical assistance.

Despite the plausibility of the missing input approach, it has not generally worked in application. Neither more money, more information, nor more technical assistance by themselves have consistently improved educational practice. The Change Agent research suggests why: these forms of outside aid have not had much leverage on the local factors that spell the difference between success or failure of educational innovations.

In particular, early federal efforts to disseminate information emphasized the need to make school districts aware of exemplary innovations. If the problem were only one of getting districts to *adopt* new educational practices, then awareness would surely be critical. Adoption, however, is but the first step in the local process of implementing an innovation. Research suggests that effective implementation is more likely if adoption is done in a "problem-solving" manner, which requires that schools identify their needs and then seek solutions to them. But most federal dissemination efforts only made districts aware of new educational products, not aware of their own needs. Unwittingly, federal policy thus fueled the preoccupation of the 1960s with innovations for their own sake.

Moreover, research has shown that the awareness needed to make new educational practices work goes much deeper than information afforded by visits to Educational Fairs or by the reading of project pamphlets. To overcome implementation difficulties, local project staff must adapt the innovation to their own conditions. The relevant information for adaptation is best supplied to local implementors as they run into problems. Such information is, in brief, about the *process* of implementation, rather than about the characteristics of the innovation, as usually supplied in federal technical assistance and information efforts.

Practitioners and policy makers alike cite "money" as another

missing input preventing more effective educational performance. Although we cannot address general issues involving the equitable distribution of national funds, our research did examine the role played by federal funding in stimulating educational change. Federal funds allowed many districts to undertake activities they could not otherwise support. For example, Title III funds have been used to expand teacher-initiated pilot projects for more general use in district operations. Federal grants also served as "start-up" funds for new teaching practices, many of which required substantial initial investment in hardware or staff development. In many cases, however, federal grants were significant because they bestowed legitimacy on local projects, gave them the aura of "special status," and provided some measure of "protection" for politically controversial or pedagogically untested educational practices.

Yet the record of the way school districts used federal grants is spotty. Many projects were started simply for the purpose of receiving federal largesse and, as far as we could tell, without any real intention to deal with local problems. The result of this behavior, which we call *opportunism*, was predictable: opportunistic projects were usually poorly implemented and almost always disappeared with the last federal check. Projects taken seriously by district officials and school staff generally avoided the non-implementation typical of opportunistic projects. But even effective implementation did not always mean achievement of the longer-term federal objective or promoting stable change in local practices. The end of federal funding generally resulted in a reduction of resources for most projects, particularly expensive ones. For example, innovations that had used soft money to reduce the student-to-adult ratio (e.g., by hiring aides) were cut back to live within the district budget. Many districts complained of insufficient resources to carry on project activities and to make necessary replacement of project staff. But financial difficulties involved questions of budgetary allocations that could have been foreseen and planned for from the project's inception. However, few districts in our sample adequately prepared themselves for

sustaining or spreading the changes resulting from even successfully implemented projects.*

In summary, federal funds can stimulate the adoption of projects that are generally in accord with national priorities. But adoption assures neither effective implementation nor long-run continuation. A new funding strategy is needed if federal grants are to significantly affect those local choices and conditions that determine the implementation and continuation of planned change efforts.

Technical assistance, the third missing input, starts from a correct premise--school districts need help. However, the various federal programs generally have failed to provide relevant assistance or have given the right assistance in the wrong way. For instance, some assistance has been narrowly technical and overly detailed, usually because it essentially tried to replicate success that occurred elsewhere. This excessive specificity did not help local project staff, who either dismissed the "assistance" or found it unworkable. The underlying problem in this approach to technical assistance resembles difficulties encountered in the technocratic approach: the innovation is thought of as a *product* rather than as a *process* requiring adaptation.

Another related problem concerns how assistance has been given. For example, outside experts have often been hired with federal funds. However, our research shows that outside experts were typically ignored as being too abstract or too unaware of local problems. Even when teachers saw them or other forms of outside assistance as relevant, the local staff tended to rely so heavily on these "inputs" that they were unable to adapt the project to their own needs. In short, federally supported assistance efforts often were ineffective because they did not deal in an adaptive way with the concrete problems facing local staff. Insofar as assistance remains an "input," rather than an integrated component of the implementation process, it cannot achieve the educational improvement that federal planners anticipate.

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*See P. Berman, M. W. McLaughlin, *Federal Programs Supporting Educational Change, Vol. VII: Factors Affecting Implementation and Continuation*, R-1589/7-HEW, April 1977.

Assumption 3: *Improving Educational Performance Requires a Project Focus. It is assumed that reform can best be achieved by promoting projects of an experimental, trial, demonstration, or categorical nature. In light of the relatively low percentage that federal funds represent of local and state school expenditures, some policy makers believe the federal government can maximize its leverage on the nation's school districts by concentrating federal aid on discrete projects and spreading federal resources as widely (and as politically representatively) as possible. The federal project focus is presumed to have three advantages: (1) the targets of categorical programs are more likely to benefit from the services, (2) project change of a narrow nature appears more feasible than systemic change in school districts, and (3) improvement in school performance is best accomplished by attacking each discrete problem (equal opportunity, reading, etc.) independently because problems of schooling consist of discrete, identifiable issues.*

Both the technocratic and the missing inputs approaches typically had a project focus. Thus, their inadequacies obscured the serious difficulties implied by relying on projects as the vehicle--typically the *only* vehicle--for change. Rather than reiterating the difficulties inherent in a technocratic or missing inputs approach, the following discussion considers only effectively implemented projects and examines why the project approach usually did not satisfy federal goals.

The Change Agent study found that effectively implemented projects were often not continued after the end of federal "seed money." Districts start projects for many reasons--e.g., to solve an educational problem, to take advantage of the availability of extra funds, to relieve political pressure from local constituents, or to accommodate staff desires. Whatever the initial reasons are, district officials must take a variety of steps to assure the project's survival when the federal funding period closes. In particular, they have to make the project part of the local system so that it is not vulnerable to budget cuts, changes in political pressures, or personnel turnover. Most

districts in the Change Agent sample did not take the necessary actions; consequently, many projects--even highly successful ones--were short-lived.* The problem of sustaining change in educational practices thus depends on the willingness and capability of the school system, not simply on the project's resources or personnel.

A second deficiency of the project focus arises from the "loose-coupling" of school systems. Change in one aspect of schools or of schooling can occur without affecting other aspects. For example, Title I projects providing remedial help in elementary school may have no effect on practices in junior high school, even though the Title I children are still disadvantaged and still underachieving. Similarly, projects dealing with one aspect of the curriculum may have little to do with other aspects. Moreover, a successful project in one school usually does not influence other practices in other schools. In short, many targeted projects are partial attacks on problems that require broader treatments, and a project focus can exacerbate the tendency for change to be isolated and thus more or less random within school districts.

Ironically, a third difficulty with the project focus is inefficiency. Proponents of the project focus argue that a concentrated effort economizes on personnel and resources (as well as providing an accountable and demonstrable product). However, the Change Agent study found that staff development activities and regular use of district specialists were associated with effective implementation and continuation of change efforts. These factors are, however, most efficiently supplied by the district's development of its capability to service many projects, rather than by each project individually. Yet we found few districts that had seriously invested in staff development and specialists. They tended instead to rely on doling out special project resources, which were usually inadequate to cover both the capital and continuing costs of staff development; or, they sought outside funding, which seldom was available. The result was that federally funded projects created a demand for staff development

Ibid.

and specialists, but neither the projects nor the districts generally provided adequate support. The result was ineffective project implementation and a short project half-life.

These arguments do not imply that all projects should be eliminated in favor of, for example, general aid. Categorical projects can serve an important political function in school districts, and non-categorical innovative projects can help stimulate grass-roots change. But they need to be buttressed by systemic or institutional level assistance. Thus far, federal policy has done little to help develop the institutional capacities of school districts.

In summary, federal policy generally has followed one or more faulty assumptions implied by technocratic, missing inputs, or project approaches. These misconceptions resulted in policy guidelines and procedures that, however well intended, simply failed to produce consistent educational improvement.

POOR MACRO IMPLEMENTATION

The district-level implementation discussed above can be called *micro-implementation*. Implementation also involves carrying out federal policy from the time it becomes law until federal guidelines and practices are established that affect local school district operations. We call this federal level process *macro-implementation*, which is the subject of this section and a third source of federal policy ineffectiveness. Macro-implementation of federal education policy involves both OE's administrative efforts and the relationships with other levels of government in the educational policy system--in particular, with the states. The past decade's record in both areas--administration and intergovernmental relations--demonstrates severe implementation problems.

The administrative problems that have plagued implementation at the federal level reflect the incremental, disjointed, and almost apologetic fashion in which federal education policy has been made in the past ten years or so. Federal goals and objectives typically have been articulated in a series of disparate (and sometimes ephemeral) categorical programs. The institutional structure charged with

implementing these programs, USOE, reflects this program fragmentation. USOE's organization comprises a series of fragmented fiefdoms that are not coordinated and sometimes actually work at cross purposes.*

This legislative history, coupled with the absence of an "integrating mechanism"** or coordinating unit at the federal level, has resulted in programs that neither build on the experience of past initiatives nor reinforce the activities and goals of other federal education efforts. Such compartmentalization is not only inefficient (i.e., staff in many programs are worrying about similar issues such as staff training), but it also has fostered the perception among state and local practitioners of federal priorities as disjointed and ephemeral.

Administrative effectiveness at the federal level has also been hampered by overemphasis on matters of administrative control. Federal fascination with administrative control and oversight has created at least two serious obstacles to effective USOE program implementation. One, it has meant that USOE staff have been so embroiled in the day-to-day operation and oversight of administrative machinery that they have had little time to attend to broader (and substantively more important) program issues. Bushels of required state and local evaluations, for example, arrive at USOE but busy program staff rarely have time to examine even a representative sample. Even specially commissioned federal studies, issue papers and task force reports remain unread and so cannot influence the direction of federal policy or program management.***

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* Local practitioners cite, for example, the seemingly conflicting objectives and guidelines of ESEA Title VII Bilingual Projects and the Office of Civil Rights in their efforts to ensure equity in local education practices (see R-1589/6-HEW). Or, participants in the NIE-supported Teachers' Centers express bewilderment and concern at their apparent disenfranchisement under the regulations of the new OE-administered Teacher Center program.

** See Martha Derthick, *The Influence of Federal Grants*, Harvard University Press, Cambridge, Massachusetts, 1970.

*** One veteran USOE official commented that ",,,things have gotten so bad that we have actually considered hiring someone to come in and read these reports and tell us what is in them--what they recommend."

USOE staff absorption with administrative oversight also has reinforced the relative isolation of federal managers from the reality of program operations. This isolation undoubtedly has contributed to the unrealistic assumptions and expectations discussed previously, and compounded the lack of trust that characterizes relations with state and local education agencies. For example, many practitioners believe federal policies are inappropriate in large part because "they don't understand what our situation is."

Another characteristic of federal policy that sometimes impairs state and local implementation is its emphasis on uniformity. Although uniform administration of grants and programs has a clear political and bureaucratic rationale, there are costs in terms of federal policy effectiveness. For example, these policies typically are calibrated on the "lowest common denominator", more effective state and local agencies are penalized; less effective agencies, on the other hand, have little incentive to strengthen their operations. For example, at least two states were compelled to scrap their own (more progressive) comprehensive planning initiatives in order to comply with the guidelines issued for the administration of ESEA Title IV. Similarly, the present debate over the proposed handicapped legislation suggests that the present guidelines conflict in some respects with existing practices in some of the more progressive states. For example, Massachusetts has instituted legislation intended to curb negative labeling of children, and thus the categorical identification of special service children. P.L. 94-142, however, requires states to report eligible children by type of handicap. Florida is also a case in point, where the federal formula contained in P.L. 94-142 works at cross-purposes with the state formula for providing services to the handicapped. There is also evidence that Title I requirements have suppressed the development of state and local compensatory education programs--namely, some state and local officials believe that the headaches and inefficiencies

inherent in present Title I "commingling" restrictions would be too great if they started their own programs. Standardization of federal policies also has led to inappropriate policies. Staff of bilingual programs in the West and Southwest, for example, have long complained that the federal regulations were written with the East in mind and hence are not relevant to the quite different bilingual population in their areas.

In summary, certain federal-level administrative practices--some the result of political necessity and legislative mandate--have operated to impair implementation of federal education policies at the state and local levels.

CONCLUSION

The ineffectiveness of the past decade's reform efforts can be traced to three general sources at the federal level--unrealistic expectations, misconceptions about LEA and SEA behavior, and macro-level implementation difficulties. Although we discussed these problems separately, they occurred together so that each difficulty exacerbated the others. In a larger sense, these difficulties, either separately or taken together, imply a more basic concern: the federal role in improving the performance of the complex American educational system needs rethinking.

III. REORIENTING FEDERAL EDUCATIONAL POLICY

A general challenge confronting federal planners is to develop more realistic expectations about the limits as well as the possibilities of federal policy, to establish better assumptions about SEA and LEA change processes, and to implement federal programs more effectively. More fundamentally, these changes imply an important reorientation of the federal role in improving educational performance, which should begin with a clear understanding of existing relationships among federal, state, and local educational agencies.

Accordingly, this chapter draws on research evidence to propose premises about the structure and behavior of LEAs and SEAs that are relevant to federal change efforts. The premises identify both leverage points and constraints for federal policy. They constitute operational principles that could be used in constructing federal programs. This chapter also recommends, on this basis, new federal programs or modifications of existing ones. The recommendations are guidelines for policy designers, but do not deal with specifics that emerge from legislating, administering, and implementing policy. We hope that this essay will convince the reader that a different point of view about the relationships among federal, state, and local educational agencies is needed and is feasible.

OPERATIONAL PRINCIPLES ABOUT SCHOOL DISTRICTS AND STATE EDUCATIONAL AGENCIES

The Change Agent study as well as other research over the last decade has developed empirical hypotheses about the way school districts respond to change efforts. Four propositions best summarize this research:

1. Localism. Local decisions and conditions, influenced only indirectly by federal policies, determine the outcomes of change efforts. The primary factors affecting outcomes, besides the abilities and motivations of students, are:

- o the abilities and motivations of teachers
- o participation of teachers in project decisions
- o staff assistance and development strategies employed by the district
- o leadership of school principals and project directors
- o district support for the change effort
- o district management capacity

Federal policy has to influence these factors in order to improve educational performance.

2. Critical Stages in Local Change Process. Federal policy has typically focused on providing incentives for the adoption of change efforts, but the local change process consists of two additional stages that are pivotal to both short- and long-run educational outcomes. The three states are *mobilization* (which includes adoption), *implementation*, and *institutionalization*. Mobilization is important because unless the school district undertakes a problem-solving type of planning and generates broad-based support at the outset, the change effort is likely to be half-hearted and short-lived. Implementation matters because educational outcomes ultimately depend on how teachers carry out change efforts in their classrooms. Institutionalization, which is the stage when a change effort becomes a standard part of district operations, is pivotal because change efforts, even successful ones, tend to disappear. Federal policy could increase its influence on educational outcomes if it could positively affect *all* these stages, not just the first.

3. School Districts Vary in Institutional Motivation and Capacity. Variability across school districts has long been appreciated, but its most significant aspects have not been recognized. Federal policy somewhat takes variability into account by adjusting otherwise uniform formulas for such parameters as size, number of students of a certain type, etc. Beyond these numbers, however, the district's management capacity and motivations are the main institutional features affecting

district educational performance. To influence these features which vary considerably among apparently comparable districts, federal policy may have to pursue differentiated strategies, either directly or through SEAs.

4. School Districts Need Adaptive Implementation Assistance. School districts need assistance to make change efforts work; however, such assistance should avoid the mistakes of the past decade's technical assistance with its reliance on technology, inputs, and projects. Instead, assistance should be broader gauged and include:

- o *Systemic focus*--the local school district (not the individual teacher, school, or project alone) should be the "target" of implementation assistance; it should focus on general issues of the management of change, not simply on discrete problems such as reading scores.
- o *Continuing*--implementation assistance should be offered on a steady basis.
- o *Practitioner-based*--local or regional resource personnel should provide implementation assistance.
- o *Process-oriented*--implementation assistance should support local efforts to identify and carry out solutions, rather than importing solutions from outside; it should not co-opt opportunities for local personnel to "learn-by-doing."

These four premises described on pp. 18-20--localism, stages of change, district variability, and adaptive implementation assistance--direct attention to inadequacies in federal policy. For example, they suggest that local adoption of projects should not be the sole federal policy focus; that improving the change process within school districts should take precedence over past federal concern with improving educational products; that federal evaluators should expect and encourage the adaptation of change efforts: that the federal government should promote local institutional development in addition to more targeted project approaches; and that federal legislation should establish ways

to provide more differentiated and flexible support to school districts. In short, these premises suggest a shift in the federal role toward the *process* of educational change, which might well imply a strengthened role for state educational agencies.

State departments of education are necessary partners to the federal government. Both legal custom and practicality describe a major role for SEAs in interpreting federal intent, monitoring local projects, and providing guidance and assistance, yet SEAs have been seen as the "weak link" in the federal-state-local chain of policy implementation. Furthermore, federal policy has not been enough concerned with strengthening SEA capacity. Instead, most federal policies dealt with the states only incidentally (e.g., ESEA Title I), or have bypassed it altogether (e.g., ESAA, ESEA Title VII, and ESEA Title III, Sec. 306). Federal agencies have minimized the state role because of Washington's impatience for "results," and because of the perception that SEA involvement would impair program implementation at the local level. In the short run, this may be true. But, in the long run, any significant increase in the general effectiveness of federal education policy is likely to depend on the extent to which SEAs can provide guidance and support to the LEAs. Specifically, we believe federal policy should be based on the following operational principles:

1. *SEAs Are Best Suited to Influence and to Provide Opportune Assistance to LEAs.* Despite significant weaknesses among SEAs, they are better suited than federal agencies to supply support and assistance of the type implied by the preceding premises about school districts. Federal policy should make more and more use of SEAs.

2. *SEAs Vary in Their Administrative Capacity.* State departments of education differ in their administrative capacity as well as in their motivation to implement federal policy or to influence school district behavior. As we discussed, however, federal policy generally treats the States uniformly, which

seems both ineffective and inefficient. Federal policy should develop differentiated strategies toward SEAs.

3. *Many SEAs Require Further Administrative Development.* Although SEA administrative development has progressed rapidly since 1965, many state departments remain ineffectual in influencing LEAs. Unless this situation is changed, increased federal reliance on state implementation will be futile. Federal policy should aim to improve SEAs' administrative capacity.

Although the above premises support the recent federal policy of greater reliance on states, they imply a stronger role for SEAs than federal legislation now contemplates. Indeed, taken together with the principles about school district behavior, they suggest a basic reorientation of federal policy.

These principles point in the direction of a flexible federal role that aims to facilitate state and local change efforts, rather than control them. The long-term goal would be to promote a situation in which more school districts and state departments develop the institutional capacity to improve their own performance. Thus, ideally, federal assistance would diminish over time, and the much needed federal leadership would be exercised by setting national priorities and by strengthening the natural linkages among school districts and among SEAs.

State activity also would have to be more flexible and responsive to local needs and conditions than it has been. Indeed, the ability of the states to nurture school district development would be the key to long-term prospects for educational improvement. Despite the strides stages have made over the past decade, few SEAs are presently capable of handling a more substantive role in assisting districts. It would thus appear that federal educational policy should aim to strengthen the administrative capacity of SEAs (without making them agents of the federal government within an unreceptive state government).* The

*It is not unusual for SEA officials in charge of specific federal programs (e.g., Title I) to use federal regulations as a means of remaining independent from their chief state school officers or legislatures.

exercise of federal leadership would lie in fostering interdependent--rather than either autonomous or hierarchical--relationships among federal, state, and local levels so that the inevitable bargaining and conflict among these actors could be conducted within a cooperative framework.*

RECOMMENDATIONS

Cooperative federalism cannot be mandated, but only achieved by an evolutionary process comprised of specific, mostly incremental changes to the existing educational system. Concerted federal change efforts hold the possibility of improving the performance of the educational system in the short term along the following lines:

- o local staff's ability to implement change
- o LEAs' management
- o SEAs' administrative capacity
- o links among LEAs, SEAs, and federal agencies
- o OE's administrative capacity

The remainder of this essay offers four recommendations aimed at strengthening federal policy in each of the above areas; they all consist of incremental changes that could be implemented without massive infusions of additional federal funds.

The first recommendation, an Area Cooperatives Program, is somewhat experimental, although it is consistent with the findings of the Change Agent Study. It aims to satisfy the need for more effective and efficient local implementation assistance and, at the same time, to enhance the natural linkages among school districts. The second recommendation, District-Based Professional Growth Program, proposes a way to promote districts' long-run capacity to improve their educational performance. The third recommendation involves revisions of ESEA Title IV, and offers a series of steps to strengthen the administrative capacity of SEAs as well as furthering a more differentiated,

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*For an extended discussion of cooperative federalism, see H. Seidman, *Politics, Position and Power: The Dynamics of Federal Organization*, Oxford University Press, New York, 1970; and J. L. Sundquist, *Making Federalism Work*, The Brookings Institution, Washington, D.C., 1964.

interdependent relationship between federal and state agencies. The final recommendation, which deals with federal administrative procedures, suggests a relaxation of some federal regulations as a means of improving the efficiency of federal policy and fostering better relations among the different levels in the educational system.

Recommendation 1: *The federal government should establish an Area Cooperatives Program that would assist school districts in the implementation of a broad spectrum of federal programs (e.g., Title I or Title VII of ESEA), state reform efforts (e.g., changes in school financing, in early childhood education, or in special education), and local change efforts (e.g., desegregation or adjustments to enrollment decline). The Area Cooperatives would be staffed by practitioners on "leave" from school districts within a regional cluster. The program would be funded by the federal government and administered by the States who would help establish the Area Cooperatives and ensure that they follow a set of principles discussed below.*

The most effective form of assistance to local school personnel appears to be practitioner-based assistance offered by peers who are familiar with the problems and particularities of school systems. Yet, despite the presence of some talented staff in virtually every district, teachers and administrators are seldom able to help colleagues in their own district or nearby. Federal support for Area Cooperatives--centers serving a consortia of districts--could allow practitioners to pool their experiences and to learn new skills together. Indeed, a peer-based regional cooperative appears uniquely able (a) to draw on local expertise cheaply, and (b) to provide "crisis" aid as well as regular assistance to member districts.*

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*The proposed Area Cooperatives differ from the Regional Laboratories and Centers in a number of important ways: (1) they are staffed by practitioners; (2) they are geared to the needs of a relatively small area; (3) they are not concerned with the development of new practices, but with the provision of assistance in areas related to day-to-day management concerns as well as the implementation of planned change efforts.

Area Cooperatives would not require massive federal funding. The support requirements would be relatively modest--salaries for a small administrative staff, honoraria for local staff "on leave" to serve as consultants to the districts in the area, and funds to support sabbatical leave for a small number of staff in the area. School districts would pay part of the salary of their staff assigned to the Coops. Moreover, because the Area Cooperatives would comprise a loosely organized network of professionals in an area, administrative and travel costs would be low.* Area Cooperatives would also allow school districts to take advantage of economies of scale in personnel services. For example, district curriculum specialists can no longer be supported by many districts in light of student enrollment decline. The Area Cooperatives could facilitate pooling of these valuable resources.

Area Cooperatives, in addition to being more efficient, would be more likely to provide assistance effectively because they would take advantage of existing talent and be attuned to local conditions. Participating districts could receive continuing assistance that could be extended through the critical periods of implementation. Moreover, the Area Cooperatives are consonant with long-term objectives of local capacity building and so can be tied to other such policy initiatives, particularly staff development and comprehensive planning.** In short,

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*Presumably school districts also could reduce their reliance on expensive consultants, who often are paid for by federal funds.

**Area Cooperatives also offer the opportunity to establish a new career path for school district personnel. The decline in student enrollment experienced by many school districts has necessitated a reduction in teaching and administrative personnel, and concomitantly has altered traditional career paths in many school districts. New positions in the central office or new principalships simply are not available and will not be available in the foreseeable future. Not only are the number of present staff positions effectively frozen, they also typically are occupied by young individuals brought into the district, or promoted quickly upward, during the recent period of expansion. Thus, retirement is unlikely to create job openings in the middle- or upper-management level. As a result, many vice principals cannot hope to move up to a principalship, and classroom teachers who expected to move into a central office resource position must be content with their present situation. Area service centers could be utilized to provide "sabbatical" experience for district staff, as well as to staff the center on a rotating basis with teachers or administrators "on leave."

Area Cooperatives seem suited to provide the type of adaptive implementation assistance so lacking in today's educational system.

The federal legislation authorizing Area Cooperatives should establish guidelines that states would adapt to their own conditions in administering the program. Our research suggests the following broad features should be incorporated into federal guidelines:

1. Area Cooperatives should be administered as a *separate and distinct program with prescribed funding levels.* State and local educators emphasize the importance of protecting service centers' funding, instead of making them an add-on to other programs. For example, state officials point to the experience of the Title III supplementary centers and services as an illustration of the difficulty of reserving adequate funds when the level of funding for the centers is left to the discretion of the states. Only a few states (e.g., Oregon, New York, Texas, and Colorado) were able to put enough money into the Title III centers to make them useful to practitioners. (The centers in these states, incidentally, have thrived even after Title III funding ended.) In other states, political considerations dictated that the centers be starved so that Title III funds could be distributed to as many school districts as possible. School personnel therefore believe that it would be hard to protect funds provided to the local school district for area centers. One practitioner predicted: "We'd just gobble it up in general salaries."*

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*Although this essay deliberately avoids making specific legislative proposals, it would be appropriate to point out several alternative ways in which an Area Cooperatives program could be funded. One possibility would be to update the Title III Centers by establishing the Area Cooperatives as part of ESEA, Title IV.C. If this legislative mechanism were used, then the Area Cooperatives should be a *categorical* component of Title IV with protected funds. (The reasons for making them categorical rather than left to the discretion of the States are the same as those indicated above for an independent program.) However, an independent program would be preferable to incorporating Area Cooperatives into Title IV because Title IV is associated with "change agent" type projects, whereas the Area Cooperatives ought to provide assistance to school districts for a wide spectrum of problems.

2. Although Area Cooperatives would necessarily be affiliated with state governments, they should have *no regulatory function*--i.e., they should collect no data for state evaluation nor help the state in making decisions about programs. They should only provide assistance to school districts. When some states used Title III Service Centers, for example, to do summative evaluations, considerable distrust developed between school districts and the Title III Service center staff, which blocked real communication and assistance. Similarly, SEA efforts to assist local school districts often have failed because local school personnel felt they could neither be candid about their problems nor allow SEA officials to observe them go through the trial and error process that significant change requires. To provide effective implementation assistance, Area Cooperatives would have to create a climate that encourages open exchange among participants. Federal legislation should prohibit regulatory functions for the Area Cooperatives that might prevent the development of this climate.

3. Area Cooperatives should offer *comprehensive services*. The assistance capabilities of service centers should range from specific curriculum advice to general assistance in the management of change. (Many observers blame the failure of some early Title III centers on their narrow and exclusive focus on curriculum and the absence of generalist "change agents.") It is important that subject matter specialists also be proficient in school district management and in the implementation of change. Michigan aims to do this, for example, by requiring that its state-level program specialists rotate between programs. This enables staff to remember broader system issues and concerns as they work to carry out specific programmatic assistance

4. Area Cooperatives should have a *broad-based governance structure*. Many district and state efforts to establish service centers for district staff have been thwarted because teachers perceived

them as "administrators' projects" aimed *at* them, not as resources set up *for* them. In addition, these centers often failed to offer services that teachers thought were important or appropriate. As a result, teachers ignored these centers. Moreover, different actors in a school district have different views about the needs and interests that a service center should meet. A center governance structure that incorporates these varying perceptions is more likely to receive the support and commitment from all participants.

5. Area Cooperatives should provide for the *needs of administrators* as well as teachers. The critical role of middle management is a recurring theme in research on planned change and school district behavior. Yet, administrators typically are neglected in efforts to address the professional development needs of district staff. Administrators as well as teachers need assistance in developing problem-solving skills and implementing their plans and decisions.

The five elements above are essential to an effective federal policy in support of Area Cooperatives. In addition, the following ideas merit consideration for federal policy, although research and experience have not yet fully demonstrated their utility:

- o Area Cooperatives should "sell" their services to member school districts. Texas Service Centers and some Northwest Regional Laboratory programs have required districts to buy a "subscription" to receive services. This requirement that local school districts *purchase* services has promoted high district commitment and has led center staff to tailor services to the expressed needs and interests of their "clients" (rather than according to what center staff believe districts "ought to need").*

*However, this strategy may be counterproductive in a time of declining enrollment and consequent budget crises. Ironically, even

- Area Cooperatives should be tied in with the National Diffusion Network (NDN). The activities of state facilitators funded by the NDN appear to be very successful judging by the opinions of local and state educators. The facilitators are able to provide local school personnel with an important outside (peer) perspective and to assist them in handling the broad system issues of management and planning. The programs disseminated by the facilitator often serve as vehicles for the facilitators and local personnel to start addressing the more fundamental problems and concerns of the local school system. Tying the state facilitator network to the Area Coops would give state facilitators a "home" and also add the broad experience of a "change agent" to the center staff. The facilitator's broader network contacts would also provide a link between Area Cooperatives within a state and NDN nationwide activities.
- The federal government should offer seminars and training sessions for the Cooperative's staff. State and local practitioners who advocate federal support of Area Cooperatives believe the federal government has an important function to play. They feel that federal level staff are in a unique position to facilitate a national level exchange of information and ideas. Furthermore, federal support for seminars and training sessions could afford an opportunity to develop common purpose and standards or a measure of uniformity and agreement that, as the past decade so clearly demonstrates, cannot be legislated.

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though local school district personnel most need implementation assistance and help in the management of change during a period of retrenchment (because mistakes and inefficiencies are more easily absorbed during a time of growth and expansion), these are precisely the services that are most likely to be trimmed as "nice but not essential" during a budget crunch. Consequently, requiring local subscription to support the Cooperative's activities may serve to hamper its viability, at least in the short run.

Recommendation 2: *The federal government should establish a District-based Professional Growth Program to improve school districts' capacity to provide staff development on a regular basis. The federal government would pay for it, and the States, as administrators, would arrange funding, award, and evaluation procedures based on federal guidelines.*

Federal support and leadership in local staff development would provide leverage for federal efforts to improve educational effectiveness. Many teachers become *less* effective in their classroom as their length of tenure in the district increases.* Our research indicates that teachers are most productive in approximately their third to sixth year of teaching. After that point, the "best" teachers seem to level off in effectiveness, as does the "average" teacher. This implies that teachers need a new kind of professional development experience after five to seven years of teaching in order to maintain their level of productivity and to continue to grow.

Moreover, the success of a new practice (or, indeed, of a traditional method) depends less on the inherent merit of the technology than it does on the skills and commitment of the user. Yet, teachers often have been inadequately trained to deal with innovative teaching approaches. Indeed, it has become apparent that the architects of federal "change agent" programs grossly underestimated the magnitude of teacher training or retraining necessary for the successful implementation of federal programs. For example, lack of appropriately trained teachers has been a major stumbling block in programs such as Title VII Bilingual Projects or Title I projects for the disadvantaged. In addition, such programs as Career Education, Right to Read, and Title III have suffered from inadequate teacher training components. As a result, many federally funded projects have been less effective than planners hoped--not because of "resistance," "inadequate funding," or "inadequate materials," but because staff did not have the training

*See P. Berman, M. W. McLaughlin, *Federal Programs Supporting Educational Change, Vol. VII: Factors Affecting Implementation and Continuation*, R-1589/7-HEW, April 1977.

necessary for them to implement the new procedures or to sustain these practices once federal funding terminated.*

In short, research indicates that local staff development activities could significantly improve the effectiveness of teachers and the implementation of local reform efforts. The federal government could exercise significant leadership in staff development because (a) the in-service workshops or other staff development programs offered by most districts rarely meet critical growth needs of teachers and administrators, and in fact, have sometimes been counterproductive, and (b) staff development will probably be given short shrift by school districts in a time of declining enrollments and consequent fiscal pressure.**

We believe the proposed District-based Professional Growth Program should be funded as a new federal program administered by the States. However, other funding strategies could be pursued. One option would be to designate a categorical ten percent set-aside in the present Title IV.C program. This strategy, which has the political advantage of being an add-on to existing legislation, has serious disadvantages. A Title IV administrative home would tend to structure local and state staff development efforts as "innovative projects" funded by temporary federal "seed money"; in contrast, the District-based Professional Growth Program ought to aim for systemic change within school districts that could become a long-term growth activity servicing staff for a wide variety of needs.

A second funding option would be to impose a staff development "tax" on federally supported "Change Agent" programs, e.g., Title I, Title IV, Title VII, Career Education, Right to Read, and so on. This

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* *Ibid.*

** See P. Berman and M. W. McLaughlin, "The Management of Decline," *Shifting Enrollment--A Challenge for the Coming Decade*, U.S. Government Printing Office, 1977. The expected cut in staff development is ironic because decline in student enrollment has forced many districts to reduce the size of their teaching and administrative staff. As a result, district staffing has become relatively stable, and districts can no longer rely on "new hires" to impart fresh ideas and vitality. The resulting rise in the overall level of staff experience is likely to depress the quality of district educational services.

strategy encourages integration of these traditionally disparate and disjointed staff development activities with each other and with existing district efforts. (The staff training component of special projects often has only isolated and ephemeral effects because it is unrelated to other district practices and is essentially a "one-time" activity that cannot be continued.) Although this strategy would promote the coordination and integration of various staff training activities at the local level, it also has clear disadvantages. First of all, it could create additional and burdensome paperwork for local and state project officials. Second, this strategy could encounter opposition from existing special project staff, who might fear that a joint project effort would erode their own institutional power base. Third, this strategy could generate conflicts between interest groups concerning the allocation of the pooled resources.

A third option, the one we favor, is the establishment of a new and distinct federal program. The main disadvantage of a new program is indeed serious: it might require the allocation of additional resources to education. But the merits of this approach are considerable. First of all, a separate categorical effort in the area of staff development would provide a clear signal to state and local school personnel concerning federal priorities; it would imply that the federal government considers local capacity building to be a fundamental need. Second, a federal program for local staff development could bring a measure of coherence to federal efforts if the program led to the integration of staff development concerns within USOE. Local and state practitioners alike complain about the multiplicity of disparate and uncoordinated federal project efforts. It is unrealistic, in their view, for federal officials to expect state and local officials to plan comprehensively when a similar coordinated structure does not exist at the federal level.

The federal legislation establishing the District-based Professional Growth Program should provide guidelines that states would adapt to their own conditions in administering the program. Our research suggests that the following principles should be used to develop the guidelines:

1. The states should develop procedures for insuring that awards to school districts be used to develop *the district's capacity to provide staff development.** The procedures, which could be expected to vary from state to state, would be submitted to the administering federal agency in a three-year State Plan; federal officials would be expected to assist SEAs in developing the plan and in revising it on a three-year basis.

2. Administrators should be explicitly included in staff development programs. Although the professional development needs of school district managers are no less important than those of the teaching staff, they have received little attention. The principal is the "gatekeeper of change" and a critical influence

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*The proposed program emphasizes the development of school districts' capacity to deliver staff development, rather than supporting the extensive use of teacher training institutions or schools of education in local staff development programs. These traditional sources of staff development have not been included because local practitioners almost universally believe that teacher training institutions presently offer neither relevant nor opportune services. For example, one practitioner exhorted, "Staff development is critical: whatever you do [in designing new policies], keep it out of the teachers' colleges." Accordingly, teacher training institutions or schools of education should be included in local staff development activities only at the discretion of local practitioners. If school districts elected to use their funds to purchase outside assistance, their purchasing power might provide a strong incentive for teacher training institutions to reexamine their present practices and make changes in their mode of operation that would enable them to work more effectively with local school districts. The successful collaboration of a number of the N.I.E. Teacher Centers and schools of Education testifies that this institutional arrangement can be mutually beneficial. Unfortunately, however, practitioners believe that few teacher training institutions presently have either the capacity or point of view necessary to a productive partnership.

on school site quality.* Yet, on average, they lack general management skills and the ability to create a climate that promotes teacher morale and professionalism. Instead, administrators in many school districts--both at the school site and "downtown"--often follow practices that constrain teacher effectiveness and contribute to the "calcification" observed in teachers after their first few years on the job.

3. Staff development efforts should have a *school site component.* District-wide workshops or training sessions are almost universally seen by their intended beneficiaries as uninteresting, irrelevant to their particular needs in the classroom, and a general waste of time. A school site approach to staff development has the advantage of allowing staff to identify and address *their* interests, as well as the needs particular to their student body and classroom.

   Moreover, district-wide efforts often fail because in-service sessions usually enroll only one or two teachers per school, and participants may not receive support and encouragement from their school colleagues as they try to implement the new ideas or practices. An important component of effective innovative projects is the presence of a "critical mass"--that is, enough participants in a given site to foster shared learning and give support for their mutual enterprise.** The efforts of isolated project staff can be hampered by the indifference and, at times, the hostility of non-project staff in their school building. A school site approach can meliorate this problem.

   A school site approach to staff development also brings in the principal, which facilitates the leadership style that,

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*See R-1589/4-HEW and R-1589/7-HEW. Also see M. W. McLaughlin and P. Berman, "The Art of Retooling Educational Staff Development in a Period of Retrenchment," *Educational Leadership*, December 1977.

**See R-1589/2-HEW, R-1589/3-HEW, and R-1589/4-HEW.

our research suggests, is the most effective in today's school climate. A principal who knows about the educational practices that interest the staff, who can help the staff in implementing these practices, and whom the staff sees as an ally, is in the best position to stimulate high standards of school quality.

4. Staff development programs for a local school district should have *joint governance*. Teachers and administrators should have equal voice in determining the nature, format, and frequency of staff development activities. Parity in this instance is important for at least three reasons. One, most district in-service or staff development programs are characterized by a "top-down" style of decisionmaking that affords little opportunity for teachers to participate in determining the format or nature of the activities. As a result, teachers tend to ignore the programs as "something pushed by downtown"--as simply one more obligation that will probably require substantial personal time--and, thus, they participate in only a ritualistic sense. The participation of teachers in the planning and design of a district staff development program would contribute a sense of "ownership" as well as improve the quality of the program.*

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*The Change Agent Study found that teacher participation in project decisionmaking increased the probability that a federally supported Change Agent project would be effectively implemented. This positive relationship apparently was generated both by the sense of ownership promoted by participation and by the fact that teachers had a better sense of project problems and possible solutions. Similarly, a number of district officials have commented that teachers are often more astute than central office specialists in selecting material appropriate for staff and students, and in pinpointing why a particular educational strategy is not fulfilling expectations. This is not to argue, however, that staff development programs should be entirely teacher governed. The involvement of administrators has important practical and motivational aspects. Our experience with many Title III staff development programs clearly demonstrates that middle-level and top-level administrators need to be informed about and committed to the focus and objectives of staff development programs if they are to succeed or if their effects are to be sustained. See R-1589/7-HEW.

5. Staff development programs should provide some *release time* for participants. A frequent complaint of teachers is that "if the district really cared about our in-service training, they would give us time to attend the sessions." The issue of release time is important because the provision of release time implies that district officials value staff development efforts. Teachers, then, are more likely to take the programs seriously. Moreover, teaching requires an enormous amount of physical and psychic energy. It is unrealistic to expect teachers to undertake significant learning or development activities entirely on their own time. Most teachers simply have not the energy "after hours" to make the experience meaningful. Some provision of release time is crucial if staff development activities are to be worthwhile.

6. Staff development programs should contain *multiple and differentiated options*. People's learning needs change over time, and everyone learns in different ways. The staff development needs of a beginning teacher are quite different from those of a teacher with five or more years of experience. The former requires something akin to "on-the-job training," while the latter can benefit from a professional development experience that permits the synthesis of new concepts. The professional development needs of administrators vary according to their tenure in a particular job and their educational background. Effective staff development should differentiate according to levels of experience and responsibility and also provide a variety of formats--"hands-on" workshops, field trips, self-directed study.

The above features appear crucial to the effectiveness of a federally supported program of staff development. The following elements also might be used, though research and experience have not yet demonstrated their value:

- Staff development efforts should be *peer based.*[*] As the preceding discussion of Area Cooperatives emphasizes, use of outside consultants can be an expensive and often counter-productive practice. Furthermore, consultants who come from far away are often unavailable for timely follow-up. Using peers as resources for staff development activities makes it more likely that services will be opportune. This model might retain the advantages afforded by "outside perspective" by explicitly tying district staff development programs to the activities and resources of the Area Cooperatives.
- Staff development activities should include a program of *staff exchange with other school districts.* Our research and recent studies of dissemination emphasize the importance of collegial contacts in the exchange and transfer of information.[**] Practitioners seek out colleagues for advice on new practices and assessment of how these practices would work in their particular situation. Evaluations, "Ed Fairs," reports on "exemplary projects," and the like simply do not provide practitioners with the type of information they want before committing themselves to a new practice. Unfortunately, the peer contacts that could provide this important information are infrequent. A staff exchange program would permit participants to interact with peers in a different setting, and give the participants enough time to understand those factors that enhance or impede

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[*] The experience of many of the N.I.E.-sponsored teacher centers provides strong support for a peer approach to professional development. See, particularly, Kathleen Devaney, ed., *Essays on Teachers' Centers*, Teachers' Center Exchange, Far West Laboratory for Educational Research and Development, 1977.

[**] See R-1589/3-HEW, R-1589/4-HEW; M. Fullan and A. Pomfret, "Research on Curriculum and Instruction Implementation," *Review of Educational Research*, Vol. 47, No. 2, Spring 1977, pp. 335-397; John A. Emrick, *Evaluation of the National Diffusion Network*, Stanford Research Institute, Menlo Park, California, 1977.

particular new practices. In turn, these "exchange personnel" could provide a valuable outside perspective to staff in the host district.

- o *Professional organizations* (NEA, AFT, AASA, etc.) *should participate* in the planning and governance of the federal staff development program. Professional organizations have an obvious stake in the direction of a federally supported program for local staff development. If brought into the system, these organizations could be useful advocates. If excluded, they could become powerful opponents. In many respects, the professional organizations know more about local staff development issues than any other federal (and probably state) level agencies. The involvement of the professional organizations makes sense not only because of their formal role in the system, but also because of their unique information concerning local practices and preferences.

Recommendation 3: *The federal government should revise ESEA Title IV to function more effectively in strengthening the administrative capacity of SEAs and enhancing their ability to play a more effective role in influencing LEA educational performance.*

There is little information about the ways SEAs function or about the factors that affect agency practices. Consequently, our recommendations concerning the state agency must be very general and tentative. We have included these preliminary recommendations because our research suggests that the long-run effectiveness will depend significantly on the capacity of state education agencies. Local districts need assistance; a federal pass-through or a federal-local link cannot provide the appropriate support for LEA development and planned change.

ESEA Title V, an attempt to strengthen the state departments of education, suffered the same fate as many federal programs: good ideas that were poorly implemented.* It has now been consolidated

*See J. T. Murphy, *State Education Agencies and Discretionary Funds*, Lexington Books, Lexington, Massachusetts, 1974.

into ESEA Title IV.C but, in the words of one federal program official, funds are still used for "maintaining, not strengthening." Recent USOE investigations suggest that those monies nominally spent on institutional development at the state level are in fact generally being used to fund positions and services that already exist. Few states use these funds to support new efforts or activities that could improve their SEAs' administrative capacity.

Nonetheless, many of the ideas and guidelines contained in the old Title V legislation remain relevant and appropriate. However, considering the political difficulties of resuscitating Title V as a new program, it seems more feasible to strengthen the provisions in the existing Title IV legislation. The following suggestions are designed to use Title IV as a vehicle for developing the capacity of SEAs to assist school districts.

1. The federal government should require matching funds for at least part of the Title IV funds allocated for *strengthening the administrative capacity of SEAs.*

   The "strengthening" funds allocated through Title IV-C are generally not used to support developmental activities in the SEA. Instead, in many states, the Chief State School Officer has come to view the strengthening funds provided by Title V, and now by IV.C, as an "entitlement" that could be used to support established SEA practices. (To this point, USOE on-site reviews reveal that some states have not bothered to revise their "strengthening" objectives in a number of years.) A requirement that states provide matching funds, at least in part, for federal funds allocated to strengthening activities might serve to focus SEA attention on the developmental objectives of the funds--to think through a program for the use of strengthening funds rather than routinely allocate the funds to routine activities. A policy that combined the use of

waivers of particular federal requirements with the incentives implicit in a matching funds strategy might go even further to encourage SEAs to undertake necessary planning and development activities.

2. The Title IV State Advisory Group membership should be revised to include *expertise in the management of change.* The Title IV State Advisory Group is supposed to represent the "broad cultural and educational interests in the state." Although this strategy works to ensure that no single interest in the state will capture Title IV funds, this membership scheme often fails to provide broad advice to the state and local districts on the effective management of change. A strategy of special interest representation, in many states, has imparted an "advocacy" flavor to the group's deliberations. As one state department official put it, "The special interest people simply sleep through the meetings until something relating to their group is brought up. Then they wake up and give a speech. The result is that we don't get the help this group could be giving us on how the program or projects could be managed better." The State Advisory Group also should include two experts in educational administration and the management of change.

3. Annual Program Plan requirements should be revised to emphasize a *flexible iterative planning process.* State planners emphasize program objectives and programs means, not the nature of the planning process. The state plan is treated as a contract that states must fulfill; therefore, state officials commit themselves only to those program objectives they are confident will be achieved during the year.* The contract and

*As one official put it, "I'd be crazy to commit the state to anything I wasn't sure we could do. The Legislature would never allow us to take risks with a legal document like that. So I just keep it all to the minimum in order to avoid audit exceptions. I send in the minimum amount of information needed to get funded; the less we are accountable for, the better."

the guidelines for the state plans inhibit ambitious or thoughtful program objectives and, in the view of many state Title IV officials, also inhibit any real planning as well. State officials argue that they cannot possibly anticipate everything that will affect program operations over time. But because the present guidelines do not allow mid-course revisions and amendments to the plan, there is no meaningful planning. The Change Agent Study supports the view of many Title IV state officials that effective planning is a continuing, flexible process that is revised and reassessed on the basis of experience gained during project implementation. We believe that federal guidelines should call for an adaptive planning process.

4. *Annual Program Plans should be extended to a period of three years.* SEA officials almost unanimously oppose the present requirement to submit an annual state plan to USOE, because of its inefficiency. Annual submission requires considerable duplication in effort (i.e., many statistics remain constant) and artificially attenuates the time horizon because significant change cannot be made in one year. The result is an overload of administrative paperwork and a proliferation of the same disjointed, unrelated, and incremental program management that the federal government would like to replace.* A three-year state plan, annually updated, would permit SEA officials to plan more effectively.

5. States should key their awards of Title IV.C funds to the stages of the local innovative process by *awarding three types of grants--a planning grant of one year duration, an implementation grant of two to three years duration, and an incorporation grant of two years duration.* Federal change agent programs generally award fixed-term grants regardless of the

*For example, one official complained: "It seems like we are always filling out state plan forms, and never actually accomplishing anything. Somebody has to work on that thing almost all year just to get it in on time."

school district's ability to introduce and sustain the innovations they propose. Yet we observed similar innovations being approached and installed very differently by school districts according to their capacities to innovate. For example, one district attempting to initiate a remedial mathematics project based on Piagetian principles was struggling to operationalize the philosophical principles of the project; another district funded at the same time and at an equivalent level was dealing with the project at a more advanced level--it had refined the philosophical principles to meet local needs and was in the process of producing classroom materials. When the three-year federal grant ran out, the project participants in the first district had learned to deal with the innovation, but the district could not afford to continue it; the other district had used the federal money to begin district-wide dissemination.*

These are but two of the many cases pointing to the need for a differential funding strategy. Rather than blanket awards for a fixed number of years, states could award grants according to whether a school district is initiating a new project, implementing an already planned project design, or incorporating within the district a project that the district has successfully implemented on a limited, trial basis.

New projects would be started with a one-year grant. It would have two aims: to allow districts to produce a proposal that satisfied state-determined criteria (e.g., problem identification, needs assessment, and personnel assignment); to enable a district planning process that encouraged participation from different levels in the district. (Research has suggested that such participation may be vital for successful innovations.) If a school district sought a follow-on grant, it would be required to show State Education Agency (SEA) evaluators that its planning process involved broad participation.

*See R-1589/4-HEW.

The award for project implementation would pay districts for up to three years to carry out new educational practices. Although this grant would be similar to the present Title IV.C award, it would be preceded by the planning grant process, which would allow SEA personnel to provide assistance to LEAs in planning for project implementation. Research has shown that the strategies chosen to implement a project can be pivotal for the project's success; SEA personnel could provide useful advice on appropriate strategies, adapted to the needs of local implementors.

The need for a project incorporation grant of up to two years arises because school districts often cannot afford to sustain or spread even successful innovations after federal funding ends. However, in addition to financial considerations, we found that unless the school district was committed to make the new educational practice a standard part of district operations (as opposed to retaining its "special project" status), the project would eventually fade away, regardless of its past success or staff interest. To help insure the district's commitment, states should (a) require matching grants from LEAs and/or (b) arrange for on-site visits of SEA personnel before awarding an incorporation grant, in order to evaluate district plans for sustaining the innovation, as well as to offer advice.

In addition to the above modifications in present Title IV guidelines, a number of state officials have urged that the state plan requirements be rewritten to include specific emphasis on the development of the local institutional capacity. In the view of these officials, a requirement that the SEA have a program for assisting school districts in strengthening system operations would not only force the state department to broaden its perspective on program operations but, in many states, it would serve to draw the attention of the state legislature to this more general and fundamental issue. Because of its legal stature, state officials feel that the "state plan has some real

clout" with both SEA staff and the legislature. Accordingly, they believe that these modifications in state plan requirements would have more than symbolic effect on SEA procedures. However, these officials add, if state plan requirements are revised, Office of Education guidelines should include examples of what is intended in terms of comprehensive planning and state level assistance in the management of change at the local level.

Recommentation 4: *Federal agencies should develop accounting and programmatic control procedures that permit the integration of federal and state (or local) categorical funds.*

Many federal categorical efforts, particularly in the areas of bilingual, handicapped, and compensatory education, are less effective than they might be because federal guidelines which prohibit the "commingling" of federal funds with state or local dollars often serve to inhibit the programmatic coordination of similar initiatives at the state and/or local levels. The bureaucratic costs and red tape associated with program coordination have often discouraged states of local districts from undertaking initiatives on their own in these areas. A single administrator, for example, could not receive salary from Title I and still participate in the direction and planning of district-sponsored compensatory efforts without complicated time allocation procedures. Likewise, specialists in compensatory education cannot serve non-Title I children if they are paid wholly through Title I. In short, although it is possible to prorate salaries, many districts--especially the less affluent districts with minimal budget and accounting staff--believe the administrative costs are too high. Thus, they either elect to duplicate staff efforts, or to forego a local categorical program altogether.

Moreover, in those cases where states have established their own programs, the state programs are typically not well coordinated with federal programs addressing the same target groups. Consequently, many resources are duplicated, some practice work at cross purposes, and

the range of services provided to the target population is less effective than it could be. For example, because ESEA Title I funds cannot be mixed with California Early Childhood Education funds, a comprehensive plan utilizing both resources of funding cannot be developed at the school level. Title I eligible youngsters thus can receive *fewer* benefits than they would if these state and federal efforts were combined. The coexistence of ESEA Title VII and California's Chacon program for the bilingual provides another example of programs working at cross purposes. Because the staff training designs are different for these two programs--and because the sequencing of bilingual activities differs as well--neither staff nor students can move freely between these two bilingual programs. Nor, of course, can these funds be combined to avoid duplication of what are, in the instance of bilingual education, particularly scarce staff and material resources.

Congressional concern that federal funds not supplant state or local dollars is legitimate. However, modification in federal policy to allow commingling of administrative funds and to encourage program coordination would enhance the effectiveness of both state (or local) and federal funds. This policy might also provide an incentive to other SEAs and LEAs to begin their own projects and plan comprehensively for the use of these pooled resources.